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Attorneys for Creditor
Aggreko

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PG&E CORPORATION,
Debtor-in-Possession.

Case No. 19-30088-DM
Chapter 11
Hon. Dennis Montali

In re
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtor-in-Possession.

Case No. 19-30089-DM
Chapter 11
Hon. Dennis Montali

**DECLARATION OF FRANK PIZZILEO
IN SUPPORT OF AGGREKO'S
RESPONSE TO CERTAIN FIRST DAY
MOTIONS**

Date: January 31, 2019
Time: 10:00 a.m.
Ctmm: 450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102

I, Frank Pizzileo, declare as follows:

1. Except as indicated otherwise, I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto. I am over 18 years of age. I am a Sales Manager of Aggreko with management responsibility for the Debtors' account, and I make this declaration in support of Aggreko's Response to Certain First Day Motions.

1 2. As of the filing date, the Debtors owe Aggreko a total of \$2,853,342.50.

2 3. The Master Services Agreement between Aggreko and the Debtors does not
3 prohibit Aggreko from filing liens.

4 4. Aggreko's temporary power solutions are an integral part of the Debtors' efforts to
5 provide their customers with reliable electric service when permanent power is not available.

6 5. Aggreko provides power to the Debtors' customers when the Debtors de-energize
7 transmission lines, distribution lines, and/or substations to perform preventative maintenance,
8 upgrades, or repairs, or to prevent wildfires. Aggreko's services have become a fully-integrated
9 program within the Debtors' business and assist with compliance of PUC guidelines on CAIDI,
10 SAIDI, and SAIFI metrics.

11 6. Aggreko is one of only two suppliers approved by the Debtors to provide its
12 specific services to the Debtors, and it is the only supplier capable of providing certain
13 specialized equipment that integrates directly with the Debtors' power distribution system. For
14 example, Aggreko's "PowerPak" system provides up to 500 kW of power at distribution-level
15 voltage with electrical protection and a "plug-and-play" grid interface, all contained in one trailer.
16 The Debtors utilize the PowerPak system to restore power quickly for up to 300 customers when
17 an unexpected power outage occurs. Aggreko also designed and provides a specialized medium-
18 voltage switchgear to integrate with the Debtors' grid that allows the Debtors to seamlessly
19 transfer customers from the grid to Aggreko's generators at the start of a planned clearance, and
20 back to the grid at the end.

21 7. The Debtors use Aggreko's medium-voltage power solution, along with the
22 specialized equipment mentioned above, as part of their Wildfire Prevention Program. The
23 Debtors utilize Aggreko's downstream power generation capabilities when they identify that a
24 section of electrical line is in a high-risk fire zone such that a shutdown of that line is required.
25 Affected customers can include critical facilities (*e.g.*, jails, hospitals, government buildings,
26 traffic signals, fire departments, 911 centers, police departments, etc.) that would present a safety
27 risk to the public if left unpowered.
28

8. Further, in the ordinary course of business, the Debtors rely on Aggreko's equipment and services to mitigate the reliability impact of planned and unplanned outages and ensure a continuous supply of electricity to the Debtors' customers.

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I declare under penalty of perjury that the above statements are true and correct. This declaration is executed on January 30, 2019, in St Louis,

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1/s/ Frank Pizzileo
Frank Pizzileo